

STATEMENT IN
SUPPORT OF PROBABLE CAUSE

IN RE: Tomas Don WRIGHT

I, Gerardo Morales, declare and state as follows:

On July 17, 2024, the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) along with the Laredo Police Department (LPD) Juvenile and Gang Enforcement Team and US Border Patrol, conducted a controlled purchase of evidence operation with male subject identified as Tomas Don WRIGHT for the purchase of eight (8) Machinegun Conversion Devices, also known as drop-in auto sears. Drop-in auto sears are a type of machinegun conversion devices, which is a part designed and intended solely and exclusively, for use in converting a semi-automatic weapon into a machinegun and is therefore a machinegun.

The transaction occurred at the 4200 block of Jaime Zapata Hwy. Laredo, TX. During the transaction, WRIGHT exchanged eight (8) metal drop-in auto sears for AR type firearms to an ATF Confidential Informant (CI) for a payment of \$640 U.S. Currency. During the encounter, WRIGHT also displayed an AR-15 type rifle to the CI. The rifle was being stored in the hatch back area of the vehicle.

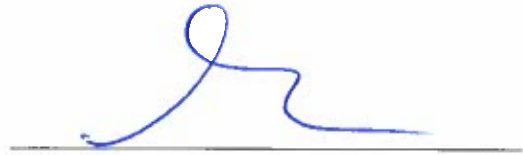
After the exchange, WRIGHT, who was traveling alone in a 2018 Maroon Toyota RAV 4, exited the area of the parking lot. LPD marked units conducted a traffic stop with WRIGHT at the 4400 block of US Hwy 359 Laredo, Texas. WRIGHT was detained and transported to ATF Laredo Field Office, for further questioning. After the traffic stop and during the inventory process, officers and agents located inside WRIGHT's vehicle a Make: Palmetto State Armory, Model: M4 Carbine, SN# W1914607, 5.56 Caliber, Rifle. The rifle was loaded with 15 rounds of .223 caliber ammunition. Also, \$640 U.S. Currency was found in the center console of the vehicle. All items were recovered as evidence.

During the interview process and after WRIGHT's Miranda Waiver, WRIGHT admitted in possessing and manufacturing drop-in auto sears (both plastic and in metal), selling the drop-in auto sears in question for profit, having knowledge of the firearm located inside his vehicle, and having knowledge of his felony conviction status.

WRIGHT is a convicted felon out of the 406th District Court Webb County, Texas for Possession of Controlled Substance with Intent to Deliver-Cocaine 2nd Degree Felony, Case No. 2021CRL000907-D4, with a seven-year confinement in the institutional division - Texas Department of Criminal Justice (TDCJ).

I declare (certify, verify, or state) under penalty of perjury that the foregoing is true and correct.

Executed on the 18 day of July, 2024

A handwritten signature in blue ink, consisting of a large loop followed by a horizontal line and a small flourish.

Gerardo Morales, ATF Task Force Officer

Having reviewed the foregoing declaration, I find probable cause that the defendant(s) named above committed an offense against the laws of the United States and may therefore be further detained pending presentment before a judicial officer

Executed on the _____ day of _____, 20 _____.

UNITED STATES MAGISTRATE JUDGE